

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
LAFAYETTE DIVISION

JANE DOE,
Plaintiff,

V.

PURDUE UNIVERSITY, a public
entity, and LANCE DUERFAHRD,
an individual,
Defendants.

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) CAUSE NO: 4:18-CV-00072-JVB
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DECLARATION OF JANE DOE

I, Jane Doe, being duly sworn upon my oath, do hereby depose and state as follows:


1. I am an individual, over the age of 21 years old, and have personal and first-hand knowledge of the matters set forth herein.
2. I am the Plaintiff in this case.
3. I was born and raised in India.
4. I came to the United States on a Student Visa, and began attending Purdue University in the fall of 2015. In my culture, premarital sexual conduct is taboo.
5. Even the discussion of sex was taboo and accordingly, I had no sex education whatsoever.
6. I had an ultra-conservative upbringing. I did not date or otherwise engage in consensual sexual activity.
7. In my culture, teachers are revered, and students are taught to submit to their authority. I saw and experienced verbal abuse and corporal punishment by teachers.
8. The concept of a sexual relationship with a teacher or professor is unimaginable.
9. On September 29, 2016, Purdue Professor Lance Duerfahrd sexually assaulted me at his home, after promising to help me prepare for his midterm exam.

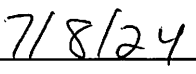
10. On October 4, 2016, Professor Duerfahrd sexually assaulted me a second time at his home, after he directed me to return to watch films that were presented in class.
11. Thereafter, I retained counsel, who filed a formal complaint against Professor Duerfahrd with Purdue University.
12. Despite opposition from my parents, who insisted that I immediately return home instead, I filed a formal complaint against Prof. Duerfahrd. Not only did I risk losing my Student Visa, but I also faced the petrifying possibility of social ostracization in my home country if Prof. Duerfahrd's sexual assault against me were to come to light.
13. Due to my report, Prof. Duerfahrd was prevented from victimizing another student, and Purdue University had to finally let Prof Duerfahrd go from his position.
14. I have suffered and continue to suffer great harm and pain, as a result of Prof. Duerfahrd's sexual harassment and sexual assault, and Purdue University's failure to take action before it was too late.
15. I have been diagnosed with post-traumatic stress disorder, panic disorder and agoraphobia due to the assaults by Professor Duerfahrd.
16. In my culture, victim shaming is common and widespread. Someone in my position has a high probability of being ostracized and families will not approve marriage to a woman who has been the victim of sexual assault.
17. I do not mean to suggest that I would be a victim, but in my culture women who are sexually assaulted have been put to death for bringing disgrace to their families, which is known as "honor killing".
18. The disclosure of my name and the details of my assault would subject me to harassment, ridicule, embarrassment and further emotional harm if my name were to become public at trial.

19. The disclosure of my name would also bring dishonor to my family and would be the functional equivalent of the “Scarlet Letter” in India.

Further, Declarant sayeth not.

In accord with 28 U.S.C. § 1746, I declare under the penalty for perjury that the foregoing is true and correct to the best of my knowledge.



Jane Doe


Date